

FILED

UNITED STATES DISTRICT COURT

for the

2022 MAR 24 A 9:14

District of

Division

Sophia Alford, Sophia Alford (guardian) on
behalf of A.S (Minor)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the
names of all the plaintiffs cannot fit in the space above, please write
"see attached" in the space and attach an additional page with the full
list of names.)

-v-

Virginia Department of Social Services (VDSS)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names
of all the defendants cannot fit in the space above, please write "see
attached" in the space and attach an additional page with the full list
of names.)

Case No.

1:22 CV 322 PTG/IDD
(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if
needed.

Name	Sophia Alford, Sophia Alford (guardian) on behalf of A.S (Minor)
Street Address	5340 Holmes Run Pkwy #819
City and County	Alexandria City
State and Zip Code	Virginia, 22304
Telephone Number	571-277-9440
E-mail Address	sophiaalfordenterprise@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	Virginia Department of Social Services
Job or Title (<i>if known</i>)	
Street Address	801 E Main Street
City and County	Richmond
State and Zip Code	Virginia 23219
Telephone Number	804-726-7000
E-mail Address (<i>if known</i>)	citizen.services@dss.virginia.gov

Defendant No. 2

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties

is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

that List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

the *(If more than one plaintiff is named in the complaint, attach an additional page providing same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

Or is incorporated under the laws of *(foreign nation)* _____,
and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy is the amount the plaintiff claims the defendant owes or the amount at stake is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

\$15,000,000.00 Sophia Alford
\$15,000,000.00 Sophia Alford A.S (minor)

Virginia Department of Social Services Child Protective Services employees Donald Worthum Jr, and Karen De Mianjo are complicit to a Washington, DC Judge being reprimanded by the Disabilities and Tenure Board on April 21, 2020. He was reprimanded for unfairness and being impartial in a Custody Case. These employees put my kids in an Safety Plan before meeting me then and testified in a Washington DC emergency Custody hearing. Child Protective Services do not get involved in custody per Ramona Simmons. At that time Ramona Simmons was the Supervisor at Child Protective Services South County location. Karen Demianjo and Donald Worthum Jr. worked at South County location also.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

\$350,000.00 (Relief)

Mental Anguish due to Plaintiffs being separated because of Child Protective Services employee Donald Worthum Jr. and Karen De'Mianjo.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where caserelated papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

Signature of Plaintiff

Printed Name of Plaintiff

3/24/22
 Sophia Alford
 Sophia Alford

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Civil DIVISION

FILED

Sophia Alford

Sophia Alford/guardian/on behalf of A.S.(minor)

2022 MAR 24 A 9:14

Plaintiff(s),

v.

Civil Action Number: 1:22CV 322 PTG/IDD

Virginia Department of Social Services (VDSS)

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of

Civil Complaint

(Title of Document)

Name of Pro Se Party (Print or Type)

Signature of Pro Se Party

Executed on: 3/24/22 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of

(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of Pro Se Party (Print or Type)

Signature of Pro Se Party

Executed on: _____ (Date)